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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NIPPON KAISHA LINE LIMITED,
Individually and on behalf of M/V RIGEL
LEADER (IMO No. 9604940)

Plaintiff,

- against
O.W. BUNKER USA INC., NUSTAR ENERGY
SERVICES, INC., KIRBY INLAND MARINE,
LP, ING BANK N.V.

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Motion for Issuance of Warrant of Arrest filed contemporaneously herewith, Defendant and Claimant NuStar Energy Services, Inc. ("NuStar") will move this Court, at a date to be set by the Court, to issue an order directing the United States District Clerk for the Southern District of New York to issue a warrant for arrest of the funds deposited into the registry of the Court in this case, and that the arrested funds be held subject to NuStar's maritime lien to abide the judgment in this case, together with such other relief as this Court deems just and proper.

New York, New York Dated: January 23, 2015

Respectfully submitted,

BLANK ROME LLP

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